

ERIC A. LIEPINS
ERIC A. LIEPINS, P.C.
12770 Coit Road, Suite 1100
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - Telefax

Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE	§	
	§	
MUHUMMAD SIDDIQI	§	CASE 19-42834
	§	
DEBTOR	§	

**RESPONSE TO MOTION TO SHOW CAUSE WHY THE DEBTOR SHOULD NOT BE
HELD IN CONTEMPT OR SANCTIONED**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Muhammad Siddiqi, Debtor in the above-styled and numbered cause, files this his Response to Motion to Show Cause Why the Debtor Should not be Held in Contempt or Sanctioned ("Motion") and in support thereof would respectfully show unto the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion .
3. Debtor admits the allegations contained in paragraph 3 of the Motion.
4. Debtor admits the allegations contained in paragraph 4 of the Motion.
5. Debtor would show that the Trustee was informed that the Tahoe is not in the Debtor's possession and that the Debtor does not have control of the vehicle. The

vehicle has a lien against it and the Debtor has not been paying the lien. Upon information and belief the vehicle is in the possession of Debtor's ex-wife. The Debtor agrees that property can be taken by the Trustee but the Debtor does not have possession of the vehicle.

6. Debtor denies the allegations contained in paragraph 6 of the Motion.
7. Debtor makes no response to paragraph 7 of the Motion as it does not assert any allegations against the Debtor.
8. Debtor denies the allegations contained in paragraph 8 of the Motion.

WHEREFORE, the Debtor respectfully request that the Court deny the Motion, and grant such other and further relief as is just and proper.

Respectfully submitted,

ERIC A. LIEPINS, P.C.
12770 Coit Road, Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - fax

BY: /s/ Eric Liepins
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to the Chapter 7 Trustee, Mark Weisbart, 12770 Coit Road, Suite 541, Dallas, Texas 75251 on this the 24th day of September 2021.

/s/ Eric Liepins
Eric A. Liepins

